

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

In re:	SIPA LIQUIDATION
BERNARD L. MADOFF INVESTMENT SECURITIES LLC,	Adv. Pro. No. 08-1789 (BRL)
Debtor.	Substantively Consolidated
IRVING H. PICARD, Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC,	Adv. Pro. No. 09-1364 (BRL)
Plaintiff,	
v.	
HSBC BANK PLC, <i>et al.</i> ,	
Defendants.	

**NOTICE OF MOTION OF DEFENDANT PRIMEO FUND TO WITHDRAW THE  
REFERENCE TO THE BANKRUPTCY COURT**

PLEASE TAKE NOTICE that pursuant to 28 U.S.C. § 157(d) defendant Primeo Fund (“Primeo”) hereby moves to withdraw the reference of this action to the bankruptcy court.

Dated: New York, New York  
September 19, 2011

MORRISON & FOERSTER LLP

By: /s/ Gary S. Lee

Gary S. Lee ([glee@mofo.com](mailto:glee@mofo.com))  
Joel C. Haims ([jhaims@mofo.com](mailto:jhaims@mofo.com))  
LaShann M. DeArcy ([ldearcy@mofo.com](mailto:ldearcy@mofo.com))  
Angela T. Rella ([arella@mofo.com](mailto:arella@mofo.com))  
Michael Gerard ([mgerard@mofo.com](mailto:mgerard@mofo.com))

1290 Avenue of the Americas  
New York, New York 10104-0050  
Telephone: (212) 468-8042  
Facsimile: (212) 468-7900

*Attorneys for Defendant Primeo Fund*